

Message

From: Bohnenblust, Eric [Bohnenblust.Eric@epa.gov]
Sent: 10/27/2021 9:04:20 PM
To: GBahr@agr.wa.gov; Brown, Amy [Amy.Brown@freshfromflorida.com]; Jones, Patrick [patrick.jones@ncagr.gov]
CC: Echeverria, Marietta [Echeverria.Marietta@epa.gov]; Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]
Subject: EPA Solicitation for AAPCO Comments on EPA 24(c) Web Guidance Per Inspector General Audit

Pat, Amy, and Gary,

I had previously spoken over the phone with Pat Jones about one of OPP's Corrective Actions from the Inspector General's audit of the Section 24(c) SLN Program titled, "EPA is at Risk of Not Achieving Special Local Needs Program Goals for Pesticides" released February 10, 2021. Specifically, corrective action 3 for OPP is to by December 31, 2021 solicit input from AAPCO to determine if additional guidance is needed beyond the information provided to the States posted on EPA's website on November 20, 2020.

Therefore, EPA is requesting that AAPCO review the guidance on EPA's website (<https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registrations>) and determine what, if any, additional supporting materials or guidance are necessary or would aid the States' work on FIFRA 24(c) actions.

We also recognize that on July 13, 2021 AAPCO submitted a letter to the Administrator providing comments on EPA's current Section 24(c) policies. EPA is working on this issue separately and intends to provide AAPCO with a response to the letter to the Administrator at a later time. Therefore, we request that comments on the 24(c) guidance on EPA's website be focused on the 24(c) interpretation indicated in the box titled "Important Information on Requests Under FIFRA 24(c)" which is at the top of the weblink provided above.

Please let me know if you have any questions or would like to have any further discussion prior to providing AAPCO's comments.

Sincerely,

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